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5 (702) 385-5534  
6 Attorney for Plaintiff

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

GEORGE GLASPER,  
Individually,  
  
Plaintiff,

vs.

STATE OF NEVADA ex rel. EIGHTH  
JUDICIAL DISTRICT COURT;  
a Nevada public entity;  
DOES 1-10, inclusive; ROE  
CORPORATIONS 1-10, inclusive,  
  
Defendants.

**COMPLAINT**  
**Jury Trial Demanded**

COMES NOW, the Plaintiff, GEORGE GLASPER, by and through his undersigned counsel, KIRK T. KENNEDY, ESQ., who files this Complaint against the Defendant and would allege as follows:

1. Plaintiff, GEORGE GLASPER, is a resident of Clark County, Nevada and did so reside herein during all events complained of in this action.
2. Defendant, STATE OF NEVADA ex rel. EIGHTH JUDICIAL DISTRICT COURT, is a Nevada public entity which did so operate herein during all events complained of in this action.
3. Defendant named herein is an employer within the jurisdictional coverage of Title VII of the Civil Rights Act of 1964 and under Nevada's anti-discrimination statutes.
4. Plaintiff is unaware of the true names and capacities of defendants sued herein as Does 1-10 and Roe Corporations 1-10, and will amend her complaint to show their true names and capacities when the same are ascertained. Plaintiff is informed and believes and

1 thereon alleges that each of these fictitiously named defendants is responsible in some  
2 manner for the occurrences herein alleged, and that Plaintiff's injuries as herein alleged  
3 were proximately caused by the aforementioned defendants. Plaintiff is further informed  
4 and believes and thereon alleges that at all times herein mentioned each and every  
5 defendant was the agent and employee of the remaining defendants and, in doing the  
6 things hereinafter alleged, was acting within the course and scope of such agency and  
7 employment. Each defendant, in doing the acts alleged herein, was acting with the  
8 consent, permission and authorization of each of the remaining defendants.

9 5. Plaintiff Glasper timely submitted a charge of discrimination with the Equal  
10 Employment Opportunity Commission(34B-2011-01110). The Equal Employment  
11 Opportunity Commission assumed jurisdiction over Plaintiff's charge and notice of the  
12 charge was served upon the Defendant per statutory requirements.

13 6. On or about June 6, 2103, Plaintiff received a "notice of right to sue" letter which was  
14 issued from the Equal Employment Opportunity Commission pursuant to 42 U.S.C.  
15 Section 2000e-5(f)

16 7. Both jurisdiction and venue are appropriate as all events occurred in Clark County,  
17 Nevada; the Defendant operates in Clark County, Nevada; and jurisdiction is predicated  
18 upon a federal cause of action under 42 U.S.C. Section 2000, et seq.

19 8. Plaintiff, an African-American male, was an employee of the Defendant who served in  
20 the capacity as court marshal until March, 2011, wherein he was wrongfully terminated in  
21 violation of state and federal law. Plaintiff's last position was that of Lieutenant and he  
22 had supervisory authority over the administrative court marshals employed by the  
23 Defendant at the Regional Justice Center in Las Vegas, Nevada.

24 9. At all relevant times herein, Plaintiff's direct supervisor was Steve Grierson, the Clerk  
25 of the Court for the Defendant.

26 10. Plaintiff endured various forms of discriminatory conduct based on his race from his  
27 supervisor which consisted of unfair criticisms, unfair negative evaluations and reviews;  
28 unequal treatment compared to employees of other races; disparate treatment as opposed  
to other similarly situated employees of the Defendant; the denial of various workplace

rights and protections by the Defendant; retaliatory conduct directed at the Plaintiff and other adverse conduct which created an overall pervasive hostile work environment.

11. In 2011, and before, Plaintiff was subjected to various forms of discrimination and unequal treatment related to his race, to wit: African-American; as well as ongoing harassment, said discriminatory and disparaging conduct created an overall hostile work environment, by agents of the Defendant.

12. Defendant and its agents further failed to protect Plaintiff from harm caused by the discriminatory conduct of its agents, said Defendant being on notice of the wrongful conduct.

13. Plaintiff has suffered harm and damages as a result of Defendant's conduct as set forth herein in an amount according to proof at trial.

#### **FIRST CLAIM FOR RELIEF**

#### **VIOLATIONS OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964 and NEVADA LAW**

14. Plaintiff realleges, readopts and reincorporates the allegations contained in paragraphs 1 through 13 as though fully set forth herein.

15. Plaintiff, an African-American male, was subjected to regular and frequent acts of discrimination, harassment, intimidation, retaliation, threats and unequal treatment in an overall hostile work environment, as a result of conduct and actions of the Defendant and its agents, said conduct in violation of 42 U.S.C. Section 2000 et seq., Title VII of the Civil Rights Act of 1964 as amended and Nevada state law. This conduct includes, *but is not limited to*, Plaintiff suffering from race based harassment and discriminatory conduct/behavior from agents of the Defendant, from which the Defendant failed to take any reasonable steps or conduct to prohibit or protect Plaintiff; Plaintiff suffering unequal treatment based on his race by agents of the Defendant; Plaintiff suffering an overall hostile work environment and harassment caused by actions and conduct of agents of the Defendant; Plaintiff suffering an unfounded and improper termination from employment in March, 2011, by the Defendant; Plaintiff suffering unfair and unequal criticism and

1 treatment compared to other similarly situated employees of other races; Plaintiff  
2 suffering unfair and unsupported negative performance evaluations and reviews; Plaintiff  
3 suffering from overall unequal treatment as opposed to employees of other races;

4 Additionally, Plaintiff endured various forms of discriminatory conduct based on  
5 his race from his supervisor which consisted of unfair criticisms, unfair negative  
6 evaluations and reviews; unequal treatment compared to employees of other races;  
7 disparate treatment as opposed to other similarly situated employees of the Defendant; the  
8 denial of various workplace rights and protections by the Defendant; retaliatory conduct  
9 directed at the Plaintiff and other adverse conduct which created an overall pervasive  
10 hostile work environment.

11 16. As a direct and proximate result of the Defendant's actions, Plaintiff suffered harm  
12 and damages in an amount according to proof at trial.

13 **SECOND CLAIM FOR RELIEF**

14 **NEGLIGENT SUPERVISION**

15 17. Plaintiff realleges, readopts and reincorporates the allegations contained in  
16 paragraphs 1 through 16 as though fully set forth herein.

17 18. Defendant was responsible for the supervision and employment of its agents to insure  
18 that said agents performed their duties and functions in accordance with state and federal  
19 law.

20 19. Defendant was placed on notice of the race based discrimination and harassing  
21 conduct being directed against Plaintiff, however Defendant negligently, willfully,  
22 carelessly and recklessly failed to properly supervise its agents allowing harm to Plaintiff.

23 20. As a direct and proximate result of this negligent supervision by Defendant, Plaintiff  
24 suffered harm and damages in an amount according to proof at trial.

25 **THIRD CLAIM FOR RELIEF**

26 **WRONGFUL TERMINATION**

27 21. Plaintiff realleges, readopts and reincorporates the allegations contained in  
28 paragraphs 1 through 20 as though fully set forth herein.

22. Plaintiff is entitled to work in the State of Nevada in an environment free from

harassment, unlawful discrimination and other unlawful employment practices in accordance with the state and federal law.

23. Defendant failed to protect Plaintiff from harm in the workplace and thereafter willfully, intentionally, deliberately and recklessly terminated his employment, said Defendant's conduct being without foundation, justification or legal excuse and in violation of law.

24. As a direct and proximate result of Defendant's conduct which resulted in Plaintiff's wrongful termination, Plaintiff suffered harm and damages in an amount according to proof at trial.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for judgment against the Defendant as follows:

1. For compensatory damages, including, but not limited to, future pecuniary losses, physical and emotional pain and suffering, physical discomfort, inconvenience, mental anguish and loss of enjoyment of life in a sum according to proof at trial.
2. For punitive and exemplary damages according to proof at trial.
3. For back pay and interest on back pay and front pay.
4. For loss of employment related benefits, including health care and retirement.
5. For reasonable attorney's fees incurred herein.
6. For costs of suit and prejudgment interest.
7. For such other and further relief deemed appropriate by this Court.

Dated this 19<sup>th</sup> day of August, 2013.

/s/Kirk T. Kennedy  
KIRK T. KENNEDY, ESQ.  
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(702) 385-5534  
Attorney for Plaintiff

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2 **JURY TRIAL DEMAND**

3 Pursuant to FRCP 38, Plaintiff does hereby demand a trial by  
4 jury of all issues and claims raised in this Complaint.

5 Dated this 19<sup>th</sup> day of August, 2013.

6  
7 /s/Kirk T. Kennedy  
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